

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In re:

ALESSANDRO CIACCIO	:	Case No.:	02-85541-SSM
	:	Chapter 7	
and	:		
	:		
TINA B. CIACCIO	:		
	:		
Debtors	:		
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BRANCH BANKING AND TRUST COMPANY	:		
	:		
Plaintiff,	:		
v	:	Adv. Proc. No.:	03-1059
	:		
ALESSANDRO CIACCIO	:		
	:		
and	:		
	:		
TINA B. CIACCIO	:		
	:		
	:		
Defendants.	:		

**PLAINTIFF'S OBJECTIONS TO DEFENDANTS' SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS**

Comes now, Plaintiff, Branch Banking & Trust Company, by counsel, and pursuant to Fed. R. Civ. P. Rules 26 and 34 ("Rules") objects to Defendants' Second Request for Production of Documents on the grounds set forth below:

- Any and all documents regarding, referring to or relating to the "NHR AlaRM REVIEWS" referred to in Defendant's Second Set of Interrogatories to Plaintiff, Interrogatory number 2.

OBJECTION:

Plaintiff objects to Defendants' Second Request for Production of Documents Number 2 on the basis that the documents requested by Defendants are irrelevant to the issues raised in this adversary proceeding and are not likely to lead to the discovery of admissible evidence. Any and all other loan files, at one time handled by Sana Joseph which may have an "NHR Alarm Review" are irrelevant as this case pertains only to the loan made by Plaintiff to Mediterraneo, Inc. and guaranteed by the Debtors. Further, the information sought by this interrogatory is confidential customer information of Plaintiff's current and past customers.

3. Any and all documents regarding, referring to, or relating to the loans referred to in Defendants' Second Set of Interrogatories to Plaintiff, Interrogatory number 4.

OBJECTION:

Plaintiff objects to Defendants' Second Request for Production of Documents Request Number 4 on the basis that it seeks material not relevant to the issues in this case, is not reasonably calculated to lead to the discovery of admissible evidence, and is overly broad and unduly burdensome in that it could potentially contain hundreds of documents. Any other loans coming from Capital Home Funding or the other brokers or brokerage firms identified in Interrogatory number 4 are irrelevant to the case at hand, which is limited to the loan made to Mediterraneo, Inc. Finally, Plaintiff objects to Request Number 4 in that the documents it seeks contain confidential information of Plaintiff's current and past customers.

BRANCH BANKING AND TRUST COMPANY
BY COUNSEL



Joseph F. Jackson (VSB No. 31722)
Jennifer L. Sarvadi (VSB No. 47543)
WILLIAMS MULLEN
8270 Greensboro Drive, Suite 700
McLean, Virginia 22102
Phone: 703.760.5200
Fax: 703.748.0244
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objections to Defendants' Second Request for Production of Documents was sent by mail, postage prepaid to:

Russell Adams
Chung & Press, P.C.
6723 Whittier Avenue
Suite 302
McLean, Virginia 22101
703-734-0590

this 23rd day of May, 2003.


Jennifer L. Sarvadi